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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

((HONORABLE BARRY TED MOSKOWITZ))

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY JOEL SALAS,

Defendant.

CASE NO. 07CR2966-BTM

MOTION FOR AN ORDER RELEASING
CRIMINAL HISTORY DOCUMENTS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
JAMES MELENDRES, ASSISTANT UNITED STATES ATTORNEY; AND
CYNTHIA A. HERNANDEZ, UNITED STATES PROBATION OFFICER:

Mr. Jeffrey Joel Salas respectfully requests an order granting the production of all documents relied upon by United States Probation in determining his alleged prior criminal history, law enforcement contacts, and pending charges. The requested documents are necessary in determining whether the information in the pre-sentence report is correct.

Respectfully submitted,

/s/ Kris J. Kraus

DATED: February 1, 2008

KRIS J. KRAUS

Federal Defenders of San Diego, Inc.
Attorneys for Mr. Jeffrey Joel Salas

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

James Melendres
U S Attorneys Office Southern District of California
Criminal Division
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(619)557-5610
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Email: james.melendres@usdoj.gov

A copy was served by electronic mail to:

Cynthia A. Hernandez
United States Probation Officer
cynthiahernandez/CASP/09/USCOURTS

Dated: February 1, 2008

/s/ Kris J. Kraus
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